

PISANELLI BICE  
400 SOUTH 7TH STREET, SUITE 300  
LAS VEGAS, NEVADA 89101

Todd L. Bice, Esq., Bar No. 4534  
TLB@pisanellibice.com  
Debra L. Spinelli, Esq., Bar No. 9695  
DLS@pisanellibice.com  
Jordan T. Smith, Esq., Bar No. 12097  
JTS@pisanellibice.com  
Emily A. Buchwald, Esq., Bar No. 13442  
EAB@pisanellibice.com  
PISANELLI BICE PLLC  
400 South 7th Street, Suite 300  
Las Vegas, Nevada 89101  
Telephone: 702.214.2100

Philip Spector, Esq. (*pro hac vice* forthcoming)  
MESSING & SPECTOR LLP  
1200 Steuart Street, Number 1414  
Baltimore, Maryland 21230  
Telephone: 202.277.8173

*Attorneys for Plaintiff Helen Armstrong*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

HELEN ARMSTRONG,

Plaintiff,

v.

TERRY REYNOLDS, Deputy Director of  
Nevada Division of Business and industry in  
his individual capacity; STEVE GEORGE,  
administrator of the Nevada Division of  
Industrial Relations in his individual capacity;  
JESS LANKFORD, Chief Administrative  
Officer of Nevada OSHA in his individual  
capacity; and LARA PELLEGRINI,  
Whistleblower Chief Investigator of Nevada  
OSHA in her individual capacity; DOES I  
through X, unknown individuals, and ROES xi  
through XX, entities, government agencies,  
corporations, or other companies and/or  
businesses currently unknown,

Defendants.

CASE NO.: 2:17-cv-02528-APG-DJA

**STIPULATION AND  
ORDER REGARDING DEADLINE TO  
FILE SECOND AMENDED COMPLAINT  
AND DISCOVERY SCHEDULE**

///

PISANELLI BICE  
400 SOUTH 7TH STREET, SUITE 300  
LAS VEGAS, NEVADA 89101

1 Plaintiff Helen Armstrong ("Plaintiff"), by and through the law firm of PISANELLI BICE  
2 PLLC, and Defendants Terry Reynolds, Steve George, Jess Lankford, and Lara Pellegrini  
3 ("Defendants"), by and through their legal counsel, Nevada Attorney General Aaron D. Ford, and  
4 his Chief Deputy Attorney General Michelle D. Briggs, and his Deputy Attorney General Louis  
5 V. Csoka, hereby submit the following stipulation in compliance with the Court's Order on  
6 Mandate, entered on March 2, 2022, subject to the Court's approval:

7 1. Following the Court's Order on Mandate, the parties met and conferred on March  
8 16, 2022 about how this case should proceed;

9 2. The parties agree that Plaintiff shall have until May 16, 2022 to file a Second  
10 Amended Complaint;

11 3. The parties agree that discovery is necessary and appropriate;

12 4. The parties agree that the standard discovery period of 180 days as set forth in LR  
13 26-1(b) is appropriate. Once Defendants' answer to Plaintiff's Second Amended Complaint has  
14 been filed, the parties will submit a Stipulated Discovery Plan and Scheduling Order consistent  
15 with LR 26-1(b).

16 ///

PISANELLI BICE  
400 SOUTH 7TH STREET, SUITE 300  
LAS VEGAS, NEVADA 89101

DATED this 31st day of March 2022.

PISANELLI BICE PLLC

AARON D. FORD  
Attorney General

By: /s/ Emily A. Buchwald  
Todd L. Bice, Esq., #4534  
Debra L. Spinelli, Esq., #9695  
Jordan T. Smith, Esq., #12097  
Emily A. Buchwald, Esq., #13442  
400 South 7th Street, Suite 300  
Las Vegas, Nevada 89101

By: /s/ Louis V. Csoka  
Michelle D. Briggs, #7617  
Louis V. Csoka, #7667  
STATE OF NEVADA  
Office of the Attorney General  
555 E. Washington Avenue, Suite 3900  
Las Vegas, Nevada 89101

Philip Spector, Esq. (*pro hac vice* forthcoming) *Attorneys for Defendants*  
MESSING & SPECTOR LLP  
1200 Steuart Street, Number 1414  
Baltimore, Maryland 21230  
Telephone: 202.277.8173

*Attorneys for Plaintiff Helen Armstrong*

**ORDER**

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, based on the parties' stipulation above, Plaintiff shall file her Second Amended Complaint on or before May 16, 2022.

I FURTHER ORDER the clerk of court to reopen this case.

  
UNITED STATES DISTRICT COURT JUDGE

DATED: April 21, 2022

CASE NO. 2:17-cv-02528-APG-DJA

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of PISANELLI BICE PLLC and that, on this 31st day of March 2022, I caused to be served the above and foregoing **[PROPOSED] STIPULATION AND ORDER REGARDING DEADLINE TO FILE SECOND AMENDED COMPLAINT AND DISCOVERY SCHEDULE** to all parties registered for CM/ECF service in this matter.

Aaron D. Ford, Attorney General  
Michelle D. Briggs, Chief Deputy Attorney General  
Louis V. Csoka, Deputy Attorney General  
STATE OF NEVADA  
Office of the Attorney General  
555 E. Washington Avenue, Suite 3900  
Las Vegas, Nevada 89101

*Attorneys for Defendants*

/s/ Cinda Towne  
An employee of PISANELLI BICE PLLC